

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Missouri

## In the Matter of the Search of )

2019 Silver Dodge Ram Truck, VIN )  
 1C6SRFJT5KN506009, with Illinois Registration )  
 2982333 in the name of Jerome G. Williams (hereinafter )  
 the "Target Vehicle"), more fully described in )  
 ATTACHMENT A. )

Case No. 4:22 MJ 8128 SRW

SIGNED AND SUBMITTED TO THE COURT  
FOR FILING BY RELIABLE ELECTRONIC MEANS

## APPLICATION FOR A SEARCH WARRANT

I, David Rudolph, a federal law enforcement officer or an attorney for the government request  
 a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

2019 Silver Dodge Ram Truck, VIN 1C6SRFJT5KN506009, with Illinois Registration 2982333 in the name of Jerome G.  
 Williams (hereinafter the "Target Vehicle"), more fully described in ATTACHMENT A.

located in the EASTERN District of MISSOURI, there is now concealed

see ATTACHMENT B LIST.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*

*Offense Description*

Title 18, U.S.C., §§ 2, 1519


destruction of records, documents, and/or tangible objects in  
 contemplation of a federal investigation

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested  
 under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

I state under penalty of perjury that the foregoing is true and correct.

 TFO FBI

*Applicant's signature*

David Rudolph, Task Force Officer, FBI

*Printed name and title*

Sworn, to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41.

Date: April 29, 2022

  
*Judge's signature*

City and State: St. Louis, MO

Hon. Stephen R. Welby, U.S. Magistrate Judge

*Printed name and title*

AUSA: Nathan Chapman

**ATTACHMENT A**

*Property to be searched*

The locations to be searched are as follows:

- a. **Target Premises:** 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri 63103. The **Target Premises** is described as a 1511 Washington Avenue, Apartment 6A, a single-family apartment located on the sixth floor of a multifamily building of brick and stone construction. There is a business located on the building's main level with apartments above the business. The door to apartment 6A opens inward into the residence and the alphanumeric 6A affixed to the wall near the door. The utilities to the **Target Premises** are in the name of Jerome WILLIAMS, as further described in the Affidavit.



- b. **Target Vehicle:** a 2019 Silver Dodge Ram Truck, VIN 1C6SRFJT5KN506009, with Illinois Registration 2982333 in the name of Jerome G. Williams.



**ATTACHMENT B**

*Property to be seized*

1. All records and information relating to violations of Title 18, United States Code, Sections 2 and 1519 (obstruction of justice), that constitutes fruits, evidence, and instrumentalities of those violations involving Jerome WILLIAMS and others, including the following

- a. Firearms/weapons and ammunition;
- b. U.S. Currency;
- c. Electronic devices;
- d. WILLIAMS' cellular device(s) and any evidence linking the device(s) to WILLIAMS;
- e. Documents related to the **Target Premises** and **Target Vehicle** and WILLIAMS' ties to the **Target Premises** and **Target Vehicle**;
- f. Documents connecting WILLIAMS to other co-conspirators and/or victim T.A.;
- g. Clothing visible on surveillance video as worn by WILLIAMS and/or co-conspirators;
- h. Any materials constituting evidence of the murder of T.A. that is capable of being destroyed; and
- i. Financial documents.



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

IN THE MATTER OF THE SEARCH OF )  
THE **TARGET PREMISES** AND **TARGET** ) No. 4:22 MJ 8127-8128 SRW  
**VEHICLE** DESCRIBED HEREIN AND )  
MORE FURTHER DESCRIBED IN ) FILED UNDER SEAL  
ATTACHMENT A. ) SIGNED AND SUBMITTED TO THE COURT FOR FILING  
 ) BY RELIABLE ELECTRONIC MEANS

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, David A. Rudolph, being first duly sworn via reliable electronic means, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the premises known as 1511 Washington Avenue, Apartment 6A, St. Louis, MO 63103 (hereinafter the “**Target Premises**”), as well as a 2019 Silver Dodge Ram Truck, VIN 1C6SRFJT5KN506009, with Illinois Registration 2982333 in the name of Jerome G. Williams (hereinafter the “**Target Vehicle**”), both further described in Attachment A, for the items described in Attachment B.

2. I am a Task Force Officer with the Federal Bureau of Investigation, duly appointed according to law and acting as such. Concurrent with this assignment, I have been commissioned as a St. Louis Metropolitan Police Officer for the past 16 years. I am currently assigned to the Homicide Division of the St. Louis Metropolitan Police Department (SLMPD) and serve as part of the violent crime squad, which is a part of the Safe Streets Violent Crime Task Force, which is a multi-agency Federal, State, and Local task force, of the Saint Louis Division of the Federal

Bureau of Investigation (FBI). Through my training and experience, I am familiar with the debriefing of cooperating witnesses and/or other sources of information and methods of searching locations where firearms, instruments of money laundering, and evidence of other crimes may be found.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe, that violations of Title 18, United States Code, Sections 2 and 1519 (destruction of records, documents, and/or tangible objects in contemplation of a federal investigation) were committed by Jerome WILLIAMS ("WILLIAMS") and others known and/or unknown and evidence of those crimes is located inside both the **Target Premises** and the **Target Vehicle**.

5. As set forth below, there is probable cause to believe that WILLIAMS committed the subject offenses. There is also probable cause to search the information described in Attachment A for evidence of these crimes and contraband or fruits of these crimes, as described in Attachment B.

#### **LOCATION TO BE SEARCHED**

6. The locations to be searched are as follows:

- a. **Target Premises: 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri 63103.** The **Target Premises** is described as a 1511 Washington Avenue, Apartment 6A, a single-family apartment located on the sixth floor of a multifamily building of brick and stone construction. There is a business located on the building's main level with apartments above the business. The door to apartment 6A opens inward into the residence and the alphanumeric 6A affixed to the wall near the door. The utilities to the **Target Premises** are in the name of Jerome WILLIAMS, as further described in the Affidavit.
- b. **Target Vehicle:** a 2019 Silver Dodge Ram Truck, VIN 1C6SRFJT5KN506009, with Illinois Registration 2982333 in the name of Jerome G. Williams.

7. The **Target Premises** and **Target Vehicle** are both further described and photographed in Attachment A.

#### **INVESTIGATION AND PROBABLE CAUSE**

8. The United States, to include the FBI, is conducting a criminal investigation of WILLIAMS and others known and unknown regarding the commission of the subject offenses, each of which occurred in the Eastern District of Missouri.

9. On or about, April 22, 2022, at approximately 12:45 AM, SLMPD officers received a call for a shooting at 4300 North Bircher Boulevard, St. Louis, Missouri, which is located within Penrose Park, in the Eastern District of Missouri. Victim T.A. was found lying on the ground in a prone position near the park bathrooms. The victim evidenced multiple puncture wounds to the

face, arm, and torso and he was pronounced dead at the scene. Items to include two cellular telephones along with two (2) .45 caliber cartridge casings were located at the scene. Both cellular telephones found in victim T.A.'s possession were forensically examined to further the investigation.

### **Victim T.A.'s Background**

10. Victim T.A. originally lived in the Seattle, Washington area. According to his family, in early 2022, victim T.A. moved to the New Jersey area to "count money" with "cousin Ray Bradley." The family became evasive at that point and refused to provide further context as to what "counting money" meant.

11. Upon reviewing the forensic information from T.A.'s cellular devices, investigators learned that on April 9, 2022, victim T.A. sent a text message to vanity name "Ray Bradley" on Facebook, which stated that he was packing his things and to "send me a picture of the tix."

12. Victim T.A. moved into an Airbnb rented by Ray BRADLEY, Jr. on approximately April 10, 2022, at 34 Florence, Englewood, New Jersey 07631.

13. A picture victim T.A. provided to his family of "cousin Ray Bradley" was identified through facial recognition software as Ray H. BRADLEY, Sr. A review of BRADLEY, Sr.'s criminal history determined that in South Dakota he was convicted of possession of more than 10 pounds of marijuana in 2010, sentenced to 5 years of incarceration, and paroled in February 2012.

14. On or about April 17, 2022, victim T.A. stated in a Facebook message to vanity name "Zaryn Armstead" that he was earning approximately \$10,000 to \$15,000 per month. When



asked what victim T.A. was selling to earn that amount of money, he responded with “Hey”; “shhhh.”

15. Based upon my experience and training, I believe that the messages contained on victim T.A.’s phone indicate that he was likely involved in illicit activities, including drug trafficking, while in the New Jersey area.

#### **Victim T.A.’s Fear of Death**

16. On or about April 19, 2022, Victim T.A. sent a Facebook message to vanity name “Trenale Belton” including two photographs of spent cartridge casings with messages stating “But I am still alive”; “He missed and we are going to be on his ass”; and “Cuzzo’s came from STL and NC and SeaTown.” Investigators believe that T.A. was explaining to “Trenale Belton” that he [T.A.] had been shot at while he was in New Jersey.

17. On or about April 21, 2022, at approximately 5:52 PM, victim T.A. sent a text message to telephone contact “Jeremy Smith” which indicated that he was scared and going to travel to St. Louis for safety reasons.

18. According to victim T.A.’s family, he had no known ties to the St. Louis, Missouri area.

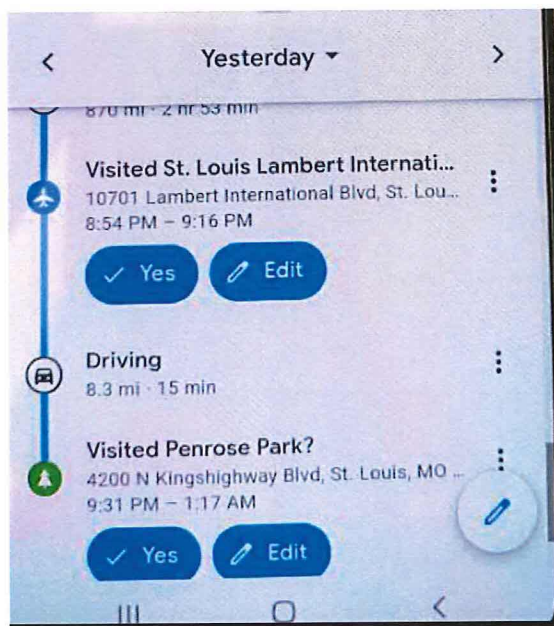
19. Investigators determined the victim T.A. obtained an Apple iPhone on or about April 21, 2022. At approximately 3:29 PM, victim T.A.’s Apple iPhone captured a screenshot of a boarding pass in victim T.A.’s name from Newark Liberty International Airport to St. Louis Lambert International Airport (STL), via United Airlines flight 4406.

### **Victim T.A.'s Arrival at Airport and Subsequent Murder**

20. On April 21, 2022, at approximately 8:32 PM, victim T.A.'s flight landed at St. Louis Lambert International Airport.

21. Using his newly acquired Apple iPhone, victim T.A. called cellular telephone (518) 937-5874 for a short duration at 8:38 PM and completed an additional, approximately 17-minute phone conversation from approximately 8:59PM to 9:16 PM.

22. Victim T.A.'s Google Maps timeline reported that he departed St. Louis Lambert International Airport at approximately 9:16 PM and arrived at Penrose Park, the location of his murder, at approximately 9:31 PM.



23. ShotSpotter, a system that detects the location of gun shots, recorded four gunshots fired at 9:31 PM within an 82-foot radius at/near the location of where the victim was found.<sup>1</sup>

**Investigation of (518) 937-5874  
and Identification of WILLIAMS**

24. On or about April 22, 2022, the Hon. Craig Higgins from the Circuit Court of the City of St. Louis, State of Missouri, issued a precision location warrant (PLW) for cellular telephone number (518) 937-5874, which the victim T.A. had communicated with upon his arrival in St. Louis. Utilizing the location information, investigators were able to track the location of the device utilizing that phone number, ultimately recovering the discarded device near the intersection of Interstate 70 and Lucas and Hunt Road, within the Eastern District of Missouri.

25. Inspection of the discarded Apple iPhone utilizing telephone number (518) 937-5874 yielded a live photograph of what investigators believe to be victim T.A. as he laid face down in a grassy area. Additionally, a short video capturing what investigators believe is an audible gunshot was located on the telephone. The video and photograph indicated a captured date and time of April 21, 2022, at 9:31 PM, which is consistent with the timing of the ShotSpotter report.

26. Further inspection revealed the discarded Apple iPhone utilizing phone number (518) 937-5874 appeared to have been activated on April 20, 2022, around 5:43 PM in the area of 3700 Union Boulevard, St. Louis, Missouri.

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<sup>1</sup> The area of the murder was outside the ShotSpotter coverage area; however, ShotSpotter does sometimes detect probable gunfire outside the confines of the normal coverage area.

27. Investigators determined that the business located at 3700 Union Boulevard was a Crown Food Mart/Phillips 66 Gas Station. To further the investigation, members of the investigative team obtained video surveillance from the Crown Food Mart/Phillips 66 Gas Station to determine who had purchased and activated the Apple iPhone bearing phone number (518) 937-5874. The video surveillance captured two individuals who together took possession of the phone.

28. The video surveillance further showed that at approximately 6:25 PM on April 20, 2022, Suspect 1 (hereinafter "S-1"), a black male wearing a light-colored hooded sweatshirt and dark baseball hat, arrived at the gas station in a red Mazda CX5.

29. At approximately 6:30 PM, the video surveillance showed WILLIAMS, a black male wearing a dark jacket, glasses and dark baseball hat, arrived in a silver color, newer model, Ram pickup truck, the **Target Vehicle**.

30. The two suspects approached the cell phone kiosk within the gas station and retrieved a cellular telephone from the attendant. Based upon a review of the cameras, it appeared that the cellular telephone was already activated by the attendant upon the suspects' arrival, and the cellular telephone was awaiting pickup by WILLIAMS and S-1.

31. Both S-1 and WILLIAMS went outside of the store and briefly met inside the **Target Vehicle** before departing in their respective vehicles at approximately 6:40 PM.



32. Further investigation revealed that the **Target Vehicle** seen at the gas station was registered to WILLIAMS.<sup>2</sup>

33. Investigators learned that WILLIAMS was previously convicted of a kidnapping resulting in death in 1990, in violation of 18 USC 1201(a)(1) in the Eastern District of Missouri, matter number 4:94-CR-00056 and sentenced to 420 months of incarceration. WILLIAMS is currently subject to supervised release overseen by the United States Probation Office for the Eastern District of Missouri.

34. WILLIAMS' probation officer provided investigators a recent photograph of WILLIAMS, which appeared to investigators to be consistent with the person seen in the gas station.

35. A comparison to the video surveillance with a photograph of WILLIAMS taken by his probation officer led investigators to believe that the individual depicted was the same individual.

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<sup>2</sup> Using historical location information relative to the discarded Apple iPhone utilizing phone number (518) 937-5874, investigators determined that the telephone traveled northbound on Jefferson Avenue from Chouteau Avenue to the area of 1500 Washington Avenue between approximately 7:10 PM and 7:17 PM on April 20, 2022. Comparing the historical information to Real Time Crime Center (RTCC) camera footage, investigators located the **Target Vehicle** traveling northbound on Jefferson Avenue from Chouteau Avenue at approximately 7:10:55 PM. The **Target Vehicle's** license plate (Illinois 2982333) was identified by a LPRS at this intersection. The **Target Vehicle** traveled north on Jefferson Avenue and turned east on Washington Avenue. The **Target Vehicle** is last observed traveling east on Washington Avenue, through the intersection of 18th Street, at approximately 7:15:45 PM.



36. Investigators noted that while the hats in the above pictures appear to be different colors, the unique logo on the hat appears to be the same.

#### **Identification of 2015 Mazda CX5**

37. At approximately 9:16 PM, the License Plate Recognition System (LPRS) at St. Louis International airport captured a red, 2015 Mazda CX5, bearing Missouri license plate NA2R2J in the departure area of the airport.<sup>3</sup>

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<sup>3</sup> On April 21, 2022, approximately one hour after victim T.A.'s murder, Candace SMITH reported to the SLMPD that her vehicle, the red 2015 Mazda CX5, was stolen from her residence at 4905 Genevieve Avenue, St. Louis, Missouri. SMITH stated that she parked the vehicle earlier in the day at approximately 5:30 PM, that no glass was found on the ground, and the key to the vehicle was still in her possession. However, on, or about, April 26, 2022, SMITH called SLMPD for a domestic disturbance stating that her boyfriend would not give her back the keys to her vehicle.



38. At approximately 9:34 PM on April 21, 2022, approximately three minutes after victim T.A.'s murder, the Mazda vehicle was captured by LPRS (license plate recognition system) driving eastbound on West Florissant Avenue from North Kingshighway Boulevard, which was an approximate two-minute drive from the scene of victim T.A.'s murder.

39. Based on queries of the LPRS and RTCC footage, investigators determined that the vehicle was the same vehicle that S-1 arrived in at the gas station to retrieve the Apple iPhone device utilizing telephone number (518) 937-5874 on April 20, 2022.

#### **Suspect Actions After Murder**

40. On April 21, 2022, video surveillance demonstrated that WILLIAMS' **Target Vehicle** and S-1's Mazda were within the same immediate area in the Carr Square Neighborhood in the City of St. Louis approximately 30 minutes after victim T.A.'s murder.

41. At approximately 9:58 PM, the discarded Apple iPhone logged that the user of the phone took 55 steps and activated the camera application.



42. Video surveillance captured that WILLIAMS' **Target Vehicle** departed the Carr Square neighborhood area at 10:01 PM and went to his residence at **1511 Washington Avenue, St. Louis, Missouri.**<sup>4</sup> S-1's Mazda departed the area at approximately 10:13 PM.

43. At approximately 10:04 PM, video surveillance captured WILLIAMS' arrival in his **Target Vehicle** at **1511 Washington Avenue, St. Louis, Missouri**, the building containing the **Target Premises** apartment. WILLIAMS remained in or around his vehicle for several minutes before exiting the parking garage to enter the apartment building.

44. At 10:11 PM, the discarded Apple iPhone logged 809 steps and the activation of the camera application.

45. Location data for the discarded Apple iPhone was consistent with the phone being present at **1511 Washington Avenue, St. Louis, Missouri** at the time of the aforementioned camera activation.

46. Based upon my training and experience, the video surveillance and phone data demonstrates that S-1 met WILLIAMS, used the camera application to view the photograph of victim T.A.'s body, and handed the phone off to WILLIAMS who, in turn, took the phone to his apartment at **1511 Washington Avenue, Apartment 6A, St. Louis, Missouri**, the **Target Premises**.

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<sup>4</sup> The **Target Premises** has utilities in WILLIAMS' name. Furthermore, the **Target Premises** is the address WILLIAMS has on file with his federal probation officer.



47. At approximately 10:49 PM, video surveillance captured WILLIAMS departing the parking garage of **1511 Washington Avenue, St. Louis, Missouri** in the **Target Vehicle**.

48. At approximately 10:55 PM, video surveillance captured the **Target Vehicle** stop on the 1900 block of St. Charles Street, St. Louis, Missouri. The video surveillance appeared to capture WILLIAMS discarding an item into a utility shaft/storm drain. Thereafter, surveillance video captured the **Target Vehicle** travel down north on Grand Boulevard towards I-70. As previously stated, investigators recovered the discarded Apple iPhone on the side of I-70.

49. On April 28, 2022, the FBI conducted a search of the utility shaft/storm drain and retrieved pieces of a torn up social security card belonging to victim T.A.

**Connection Between the Premises  
and Evidence of the Subject Offenses**

50. Based on my training and experience as a Task Force Officer with the FBI and Detective with SLMPD, after murders, suspects often store clothing and/or other evidence related to those murders in their primary residences. For example, as described above, WILLIAMS was captured on surveillance video at the **Target Premises, 1511 Washington Avenue, St. Louis, Missouri**, after retrieving a cell phone with a photograph of Victim T.A.'s body on it. Furthermore, WILLIAMS was captured on video leaving the **Premises, 1511 Washington Avenue, St. Louis, Missouri**, and minutes later disposing of Victim T.A.'s social security card.

51. Thus, probable cause exists that WILLIAMS took evidence from Victim T.A.'s murder to the **Premises, 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri**.

52. Individuals often have their phones with them at their primary residences. Based on the location data still being received in connection with WILLIAMS' phone, investigators believe that WILLIAMS is likely to have his phone at the **Premises** when the warrant is executed.

53. The phone itself is likely to have evidence related to the subject offenses on it. As discussed above, information received through state search warrant(s) demonstrated that WILLIAMS used his cellular device in the commission of this crime. And, in my training and experience, those engaged in murders often use their phones to plan their crimes and/or otherwise facilitate those crimes.

54. WILLIAMS' probation officer conducted a home visit at the **Target Premises, 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri**, on or about April 25, 2022. WILLIAMS was present at the time of the home visit.

55. An inquiry into electrical utilities provided by Ameren at WILLIAM'S apartment revealed WILLIAMS is a joint account holder for the **Target Premises, 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri**.

### CONCLUSION

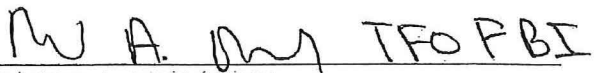
56. Based on the totality of the circumstances, law enforcement believes that WILLIAMS is residing at the **Target Premises**. Given the facts above, law enforcement believes a search warrant for the **Target Premises** and the **Target Vehicle** will assist investigators in securing evidence of the subject offenses, including clothing worn during the commission of the murder and the cellular phone being used by WILLIAMS.

57. Based on the foregoing I submit that this affidavit supports probable cause for a warrant to search the **Target Premises, 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri**, and the **Target Vehicle** described in Attachment A and seize the items described in Attachment B.


58. I further request that the Court order that all papers in support of this application, including the affidavit and warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee/continue flight from prosecution,

destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

Respectfully submitted,

  
\_\_\_\_\_  
DAVID A. RUDOLPH  
Task Force Officer (TFO)  
Federal Bureau of Investigation (FBI)

Sworn to, attested to, or affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 on April 29, 2022.

  
\_\_\_\_\_  
THE HONORABLE STEPHEN R. WELBY  
UNITED STATES MAGISTRATE JUDGE



**ATTACHMENT A**

*Property to be searched*

The locations to be searched are as follows:

- a. **Target Premises:** 1511 Washington Avenue, Apartment 6A, St. Louis, Missouri 63103. The **Target Premises** is described as a 1511 Washington Avenue, Apartment 6A, a single-family apartment located on the sixth floor of a multifamily building of brick and stone construction. There is a business located on the building's main level with apartments above the business. The door to apartment 6A opens inward into the residence and the alphanumeric 6A affixed to the wall near the door. The utilities to the **Target Premises** are in the name of Jerome WILLIAMS, as further described in the Affidavit.



- b. **Target Vehicle:** a 2019 Silver Dodge Ram Truck, VIN 1C6SRFJT5KN506009, with Illinois Registration 2982333 in the name of Jerome G. Williams.



**ATTACHMENT B**

*Property to be seized*

1. All records and information relating to violations of Title 18, United States Code, Sections 2 and 1519 (obstruction of justice), that constitutes fruits, evidence, and instrumentalities of those violations involving Jerome WILLIAMS and others, including the following

- a. Firearms/weapons and ammunition;
- b. U.S. Currency;
- c. Electronic devices;
- d. WILLIAMS' cellular device(s) and any evidence linking the device(s) to WILLIAMS;
- e. Documents related to the **Target Premises** and **Target Vehicle** and WILLIAMS' ties to the **Target Premises** and **Target Vehicle**;
- f. Documents connecting WILLIAMS to other co-conspirators and/or victim T.A.;
- g. Clothing visible on surveillance video as worn by WILLIAMS and/or co-conspirators;
- h. Any materials constituting evidence of the murder of T.A. that is capable of being destroyed; and
- i. Financial documents.